

National Assembly for Wales
Communities, Equality and
Local Government Committee

Inquiry into Home Adaptations

July 2013



Cynulliad
Cenedlaethol
Cymru

National
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Wales

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Communities, Equality and
Local Government Committee

Inquiry into Home Adaptations

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National
Assembly for
Wales

Communities, Equality and Local Government Committee

The Committee was established on 22 June 2011 with a remit to examine legislation and hold the Welsh Government to account by scrutinising expenditure, administration and policy matters encompassing: Wales's culture; languages; communities and heritage, including sport and the arts; local government in Wales, including all housing matters; and equality of opportunity for all.

Current Committee membership



Christine Chapman (Chair)
Welsh Labour
Cynon Valley



Peter Black
Welsh Liberal Democrats
South Wales West



Janet Finch-Saunders
Welsh Conservatives
Aberconwy



Mike Hedges
Welsh Labour
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Mark Isherwood
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North Wales



Gwyn R Price
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Jenny Rathbone
Welsh Labour
Cardiff Central



Ken Skates
Welsh Labour
Clwyd South



Rhodri Glyn Thomas
Plaid Cymru
Carmarthen East and Dinefwr



Lindsay Whittle
Plaid Cymru
South Wales East

The following Members were also Members of the Committee during this inquiry



Ann Jones
Welsh Labour
Vale of Clwyd



Joyce Watson
Welsh Labour
Mid and West Wales

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Chair's Foreword

“The right to inclusion, to the dignity and maximisation of independence that an adaptation can bring is just that: a right, not a privilege.”

This quote comes from a contributor to this inquiry and crystallises many of the conversations we've had during the course of this inquiry. For many people, home adaptations are a lifeline – they allow people to live a full life. Imagine feeling trapped in your own home, as some people do – it's difficult to think of it as being a “home” then.

As Assembly Members, we frequently hear horror stories from our constituents about long waits in inappropriate accommodation. Sometimes the place they call home no longer suits their needs and changes need to be made. These are vulnerable people in difficult situations – they need to be supported through these situations.

As outlined in this report, this is the latest in a number of inquiries into home adaptations in Wales. While there has been progress over recent years, I'm afraid this Committee does not feel that progress has been fast enough or consistent enough across Wales. As we set out in the report, we think that the adaptations system needs to be kept under review. We will be doing that, to ensure that improvements are driven forward and progress is being maintained.

I would like to thank all of the organisations that contributed to the inquiry. Their evidence has been useful and illuminating and has assisted the Committee in coming to its conclusions.

I would also like to thank the service users we met during the inquiry. They were able to give us an insight that only they could give. I hope that our recommendations will make the system more effective and that those service users we spoke to will be able to benefit from this work. They will know that their contributions to this inquiry have had an impact and I would like to thank them all.

I would also like to take this opportunity to thank Ann Jones AM, the predecessor Chair of this Committee, who chaired the Committee during the inquiry.

Christine Chapman
Chair

The Committee's Recommendations

Recommendation 1. The Welsh Government should report back to this Committee on an annual basis on progress against the recommendations in this report and on improving the adaptations system generally. (Page 26)

Recommendation 2. The Welsh Government should, in consultation with Local Government and social housing providers, set out what it believes are appropriate standards for delivery of the different types of adaptations services, including targets for delivery times and should ensure that all Local Authorities meet that standard. (Page 27)

Recommendation 3. The Welsh Government should continue to keep under review the impact of welfare reform on social housing. In so doing, the Welsh Government should remind Local Authorities to make appropriate use of discretionary housing payments to help tenants living in adapted housing, and to have regard to guidance on this from the Department for Work and Pensions (Page 27)

Recommendation 4. The Welsh Government should engage with the WLGA, CHC, Care and Repair and Occupational Therapists to explore the possibility of introducing a single point of entry to the system within each Local Authority area, where such arrangements are not already in place. (Page 40)

Recommendation 5. The Welsh Government should ensure that adequate information is available on the various aspects of the adaptations system. This should include information clarifying the role and rights of clients in relation to adaptations delivered under DFGs. (Page 40)

Recommendation 6. The Welsh Government should extend and promote more actively the fast-track process for small scale adaptations processed outside the DFG system. (Page 40)

Recommendation 7. The Welsh Government should explore the possibility of making the rapid response adaptations programme available across all ages and tenures, and undertake analysis of the financial implications of such an approach. (Page 40)

Recommendation 8. The Welsh Government should ensure that guidance for Local Authorities is clear on when an adaptation should be delivered via a DFG. This guidance should indicate that DFGs should be used only when it is the most effective and efficient way of delivering an adaptation. (Page 52)

Recommendation 9. The Welsh Government should require each Local Authority, working with local registered social landlords, to produce a customer charter, setting out its commitments to the residents of that area in relation to adaptations services. (Page 52)

Recommendation 10. The Welsh Government should encourage Local Authorities that have not done so already to move to an agency approach for DFGs as a model of good practice. (Page 52)

Recommendation 11. The Welsh Government should require Local Authorities to put in place a designated senior officer to take a corporate lead on adaptations. (Page 52)

Recommendation 12. The Welsh Government should encourage Local Authority scrutiny committees to scrutinise the performance of adaptation services in their areas at least once in a council term. (Page 52)

Recommendation 13. The Welsh Government should conduct an audit of adaptations services to identify best practice and the extent to which it is being implemented across Local Authorities and report back to this Committee on its findings. (Page 53)

Recommendation 14. The Welsh Government should work with the WLGA and other stakeholders to introduce performance monitoring arrangements for all adaptation services across all tenures, including DFGs, and should ensure that they are accurate and transparent. Performance monitoring arrangements should include:

- The time taken from initial enquiry to provision of an OT assessment.
- The time taken to provide an appropriate housing solution, including information on the mechanism under which that solution was delivered (for example, by DFG, Rapid Response or rehousing).

- The time taken to undertake an adaptation/DFG over a range of costs. (Page 60)

Recommendation 15. The Welsh Government should issue clear and detailed guidance on the new performance indicator so that it is interpreted and reported consistently. (Page 60)

Recommendation 16. The Welsh Government should ensure that, as a model of good practice, mechanisms are put in place in Local Authorities to monitor customer satisfaction and longer term outcomes, including the delivery and quality of work. We expect customer satisfaction to be monitored throughout the process. We expect mechanisms to be introduced so that quality of work can be independently monitored. (Page 61)

Recommendation 17. The Welsh Government should explore whether contributions from health and social care budgets to home adaptations are appropriate, so as to improve outcomes for patients. (Page 74)

Recommendation 18. The Welsh Government should conduct a cost-benefit analysis of the means test and report back to this committee on its conclusions. (Page 74)

Recommendation 19. The Welsh Government should continue to fund and explore the possibility of extending the Independent Living Grant programme. (Page 74)

Recommendation 20. The Welsh Government should ensure that all LSVTs have made adequate provision for housing adaptations in their business plans. (Page 74)

Recommendation 21. The Welsh Government should explore how Invest to Save funding can be used by Local Authorities and Local Health Boards for adaptations. (Page 74)

Recommendation 22. The Welsh Government should make accessible housing registers a statutory requirement. This should include all social housing. The Government should also explore how the forthcoming Housing Bill can be used to include private rented accommodation on such registers. (Page 74)

Recommendation 23. The Welsh Government should work with the various agencies involved in the adaptations process to ensure that opportunities to recycle equipment are maximised. (Page 74)

1. Introduction

1. This inquiry is the latest in a series of investigations into home adaptations that have taken place in Wales since 2004. The impetus for this inquiry was on-going concern that disabled people are facing unnecessary delays in receiving essential home adaptations, particularly through the Disabled Facilities Grant (DFG) process.
2. The latest performance indicator data for Disabled Facilities Grants was published in September 2012 and showed that in 2011-12, the average number of days taken to deliver a Disabled Facilities Grant ranged from 175 days in Merthyr Tydfil to 638 days in Newport. The Wales average was 326 days, a fall from 387 in 2010-11.
3. Despite this fall in the average waiting time, in September 2012 the Older People's Commissioner for Wales wrote to local authorities expressing her concerns that delays were too long and, in some cases, in breach of statutory requirements.

Terms of Reference

4. The Committee agreed to carry out an inquiry into home adaptations with the following terms of reference:

To inquire:

- Why there are still significant variations in the time it takes to deliver aids and adaptations funded by Disabled Facilities Grants across Wales;
 - Whether sufficient progress has been made on implementing recommendations from the Equality of Opportunity Committee's 2009 report on home adaptations;
 - What impact reduced resources for housing are likely to have on the provision of home adaptations;
 - Is the Welsh Government effectively monitoring the provision of adaptation services; and
 - What more needs to be done to improve home adaptation services in Wales.
5. A public consultation was launched by the Committee in December 2012, with a closing date of 1 February 2013. A summary of the consultation responses is included in this briefing.

Method

6. A written public consultation was launched by the Committee in December 2012, with a closing date of 1 February 2013. Thirty five written submissions were received. They can be accessed [here](#).
7. The Committee took oral evidence from 17 stakeholders between 27 February and 17 April 2013. Details of the witnesses who appeared, transcripts and consultation responses are provided in Annexes A, B and C respectively.
8. Agendas, papers and transcripts for each meeting are available in full on the Committee's pages on the National Assembly for Wales' website, which can be accessed [here](#).
9. The Committee held two public events with service users on 21 February and 27 June. The first event gave the Committee the opportunity to hear first hand the challenges and difficulties service users experience in the adaptations system. This information informed the Committee's inquiry. The second engagement session, held at the end of the inquiry, gave the Committee the opportunity to test its recommendations with those service users.

2. Background

Introduction

10. The past decade has seen a number of reviews and inquiries into home adaptations. This chapter provides some background on the work undertaken to date. The reviews are:

- Social Justice and Regeneration Committee review (2004);
- The Jones review (2005);
- Equality of Opportunity Committee inquiry (2009); and
- A review on progress in implementing the Jones review (2010).

Social Justice and Regeneration Committee Review (2004)

11. In 2004, the National Assembly's Social Justice and Regeneration Committee undertook an inquiry into how the housing needs of older people could be met. The inquiry was far broader than home adaptations, but a number of recommendations in the report were relevant, including:

- The need to address the long waiting times for adaptations which the committee attributed to a shortage of occupational therapists;
- Review the Disabled Facilities Grant process, including removal of the means test and parity across all tenures in terms of access to funding for adaptations; and
- Wider use of health budgets to meet demand for adaptations.

12. Although not a formal recommendation, the committee also recommended that the Welsh Government promote the development of accessible housing registers so that disabled people can be matched to suitable accessible properties, provide information on supply and demand and allow disabled people to move to other areas more easily.

13. The Welsh Government accepted the recommendations in the areas highlighted above.¹

The Jones Review (2005)

14. In 2005, the Welsh Government published a review (commissioned in 2003) of housing adaptations, including DFGs. That review was undertaken by Chris Jones, who then worked for the City and County of Swansea and, at the time of this inquiry was Chief Executive of Care and Repair Cymru. The review made almost 40 recommendations in a variety of areas. Some of the key recommendations included:

- The need for the DFG programme to be adequately resourced both by local authorities and the Welsh Government;
- The need to share best practice to tackle delays;
- The introduction of a performance indicator to monitor delivery of DFGs;
- Abolishing the means test for children;
- Delivering minor adaptations out-with the DFG/PAG framework using non-OT qualified staff so that the process is quicker and less bureaucratic;
- Promotion of adapted/accessible housing registers; and
- Continuation of the Rapid Response Adaptations Programme.

Equality of Opportunity Committee inquiry (2009)

15. The Equality of Opportunity Committee undertook an inquiry to explore the issues being faced by older people in applying for home maintenance and housing adaptations services. It found that the system of applying for and delivering home adaptation grants to older people across Wales was complex and often inconsistent. It also found that people were waiting unacceptably long times for adaptations, and that these waiting times could be longer for people living in different parts of Wales or in different types of housing.

¹ [Written Statement in response to the Social Justice and Regeneration Committee Policy Review Report's Recommendations on Housing and Older People](#)

16. The Committee made 15 recommendations, and 14 of these were accepted by the Deputy Minister for Housing, either in full or in principle.

17. Key recommendations of relevance to this inquiry included:

- Refining the performance indicator introduced following the Jones Review in 2005 to show: waiting times for agreed different types of adaptation; the time taken for each different stage of the process of an adaptation; the proportion of adaptations that were completed within a certain number of days; and different age groups.
- The Welsh Government should conduct a thorough, evidence-based review of what has been done to implement the recommendations of the 2005 Review of Disabled Facilities Grants and what progress has been made.
- The Welsh Government reports annually to the Equality of Opportunity Committee on progress made against the recommendations in the 2005 Review, and the recommendations in its 2009 report. The report should be underpinned by data collected via the performance indicator, and this should be a commitment in the Older People's Strategy.

Progress implementing the Jones Review (2010)

18. This review was commissioned by the Welsh Government following a recommendation by the Equality of Opportunity Committee, and found that there had been an improvement in waiting times for DFG funded adaptations. The review also found an improvement, though less marked, in average waiting times for local authority tenants receiving adaptations, although this information has not been collected since 2009-10 due to the number of local authorities that no longer have any housing stock. Delays in providing minor adaptations have also seen a small fall.

19. Issues highlighted in the 2010 review included:

- The number of Occupational Therapists had increased since 2005: from 187 (159.34 Whole Time Equivalent (WTE)) in 2004/5 to 228 (197 WTE) in 2007/8. Many authorities were using non OT's for minor works, freeing up OTs to deal with more complex cases.

- Many local authorities believed that the means test was not a good use of resources and that the resource invested in undertaking the test was disproportionate. The review suggested that while it might be unrealistic to abolish the means test but it could be simplified.
- Almost all of the local authorities provided a stream-lined service for smaller adaptations, although some of these were still run through the DFG process, including a means test. Other local authorities had taken them out of the DFG process all together. There were different definitions and financial limits for what constitutes a minor work.
- While local authority spending on DFGs had remained fairly static, other sources of funding had been introduced or expanded. For example, spending on PAGs had increased from £1.5m in 2004/5 to £8m in 2008/9.
- The 2005 review recommended that the calculation of the Housing formula for un-hypothecated general capital allocations should be reviewed to ensure it reflected levels of disability locally and actual demand for DFGs. This review commented that this had not been progressed and noted the potential savings to other service areas (primarily health and social care) by ensuring adequate resources for DFGs.
- Adapted housing registers were operating in many areas, and some local authorities were looking at expanding this to include private rented and owner occupied accommodation.

Welsh Government Housing White Paper

20. In the Welsh Government's Housing White Paper, which was published in May 2012, the Welsh Government makes two commitments that are specifically relevant to this inquiry. It commits to:

- Review the range of aids and adaptations programmes, to secure further improvements in delivering services, and the contribution they make to independent living and to the work of the NHS and social services; and to
- Ensure there is an Accessible Housing Register covering every local authority area, based on good practice and collaborative working.

3. The role of the Welsh Government

Introduction

21. The purpose of this Chapter is to explore issues raised during the inquiry about the role of the Welsh Government in relation to the home adaptation system, including:

- The progress made since previous inquiries;
- Leadership and strategic direction;
- Accountability;
- Legislation; and
- The impact of welfare reform.

The progress made since previous inquiries

22. As outlined in the previous chapter, this is the latest in a number of inquiries and reports relating to home adaptations. It is also evident that the same issues are raised in many of the inquiries. The evidence received by this Committee suggests that there has been some progress, but that it has not been consistent or applied across Wales. The Commissioner for Older People told us:

“There have been improvements over time, and some of those have been quite significant. I pay credit to our public services where they have brought about those changes. However, my line, as the older people’s commissioner is very clear: the pace of change has not been sufficient, there are too many inconsistencies and variations; and it depends on where you live and who you know. That is unacceptable.”²

23. Age Cymru echoed this view:

“[...] using the previous committee’s report as the baseline. It is a mixed response some six years on. There seem to be improvements in certain local authority areas [...] the feedback that we are getting [...] is that there is still little consistency across local authority boundaries.”³

² Oral Evidence, 27 February 2013

³ Oral Evidence, 7 March 2013

24. In terms of specific recommendations arising from previous reviews, Care and Repair said:

“There are bits that I do not think have been sufficiently progressed. There is a need for more widespread good practice on adapted housing registers, which is one of the issues that came out of the last committee. [...] That is good practice, but it does not happen across Wales. Good practice is a bad traveller, as they say...”⁴

25. The Housing Technical Panel felt that a number of improvements had been made since previous inquiries. They said that:

“In terms of some of the reviews done by Chris Jones, local authorities have embraced a number of the recommendations, such as working closer with occupational therapists. A number of local authorities have OTs within house, they have streamlined the process and we have looked at a systems-thinking approach in terms of that. We have fast-track priority cases and we are working closer with partners like Care and Repair.”⁵

26. The College of Occupational Therapists suggested that repeated attempts to introduce measures to address specific problems had, in practice, added to the complexity of the system:

“For us, one fundamental difficulty is that, whenever a problem has been spotted, we have added a new system or a new type of grant, which has added to the complexity. So, the whole system feels as though, when someone identifies a problem that could be solved by adapting the environment, we are immediately focused on which route we might end up on and what sort of things we can do by following that route rather than asking, ‘What would solve your problem as part of a holistic package of care?’ Although those two reports have improved some things, we have not solved that fundamental problem.”⁶

⁴ Oral Evidence, 7 March 2013

⁵ Oral Evidence, 27 February 2013

⁶ Oral Evidence, 27 February 2013

Leadership and Strategic Direction

27. In relation to the leadership role of the Welsh Government, Care and Repair suggested the Welsh Government could do more, perhaps by auditing how individual authorities are delivering services and sharing good practice.⁷ They told us that:

“The Welsh Government has shown a fair bit of leadership over the last few years on this in terms of recognising the problem, getting the reviews done, getting the outcomes of the reviews out there and engaging with the right stakeholders. There is an enormous amount of responsibility, corporately, on local authorities to then implement what comes out of the sort of reviews that we have seen.”

28. However, they went on to say that there is a role for the Welsh Government to play where Local Authorities are underperforming:

“The Welsh Government providing assistance where poor practice is detected and developing ongoing mechanisms to share best practice was another recommendation of the 2009 review and I do not think that either of those things were progressed.”⁸

29. They went on:

“[...] there may well be a role that the Welsh Government can play in pushing that agenda forward and pursuing local authorities, maybe auditing how they are delivering their services and perhaps being more proactive in engaging with those local authorities and making sure that they develop good practice. It is a mix, is it not? Corporate leadership is crucial, and the statutory PI has driven that, to an extent, but, where that corporate leadership is lacking, there could be a role for the Welsh Government to drive best practice forward.”⁹

30. The Technical Panel saw a role for the Welsh Government assisting local authorities to deal with increasing demand caused by an ageing population:

⁷ Oral Evidence, 7 March 2013

⁸ Oral Evidence, 7 March 2013

⁹ Oral Evidence, 7 March 2013

“...possibly the Welsh Government could help local authorities to understand what is going on and understand what they can do about it.”¹⁰

31. In their written submission, they called for support from the Welsh Government to improve systems:

“Further improvements to systems and process need to be developed through perhaps a systems thinking approach. The Housing Technical Panel would welcome any support the Welsh Government could provide with regard to this.”¹¹

32. Shelter Cymru felt that the Welsh Government should be prepared to intervene directly in some cases:¹²

33. Care and Repair also saw benefits for a more direct form of intervention by Welsh Government, but acknowledged that this would have an impact on resources:

“We are in a resource-driven world; if you put the resources into a Welsh Government central team to say to the 22 local authorities, ‘Here’s six bits of good practice, you are only doing three, what is happening with the others?’, and to sit down with them, talk to them and take them through that, that will help, will it not? However, we are in a resource-driven world and resources are limited. In principle, it would be great.”¹³

34. Age Cymru felt that Local Service Boards should play a greater role in encouraging a multi-agency approach, which was a recommendation made following the 2009 inquiry:¹⁴

“The increasing focus of local service boards forces that multi-agency approach to some of these issues. If the Welsh Government can play a central role in ensuring that issues like adaptations are a central feature of the work of those groupings in the future and that there is national guidance that has to be complied with—clearly, guidance is not statute, but if something comes from the most senior level that makes it

¹⁰ Oral Evidence, 27 February 2013

¹¹ Oral Evidence, 27 February 2013

¹² Oral Evidence, 21 March 2013

¹³ Oral Evidence, 7 March 2013

¹⁴ Oral Evidence, 7 March 2013

abundantly clear that there is a requirement to work across disciplines and professions, that will advance this area of work in a positive way.”

Accountability

35. The Commissioner for Older People commented on the current statutory timescales for payment of Disabled Facilities Grants (DFGs), and queried whether or not there was any accountability where these statutory timescales were not met. The Commissioner said:

“I keep coming back to this fundamental question as commissioner, which is, how many reviews do we need to have? How much good practice guidance do we need to put out there? Also, where is the accountability? Let us remember that there are 365 days. That is statutory guidance, yet who has ever been held to account for not getting it right? It does not seem that anyone is held to account for not getting it right.”¹⁵

Legislation

36. A number of witnesses suggested that the forthcoming Housing Bill could provide an opportunity to include specific statutory measures to improve the system.

37. On the issue of statutory duties, the Older People’s Commissioner said:

““I would like to see a statutory duty on local authorities to get this right for people; not just in relation to disabled facilities grants, but the wider issue. The whole point of this is to help people to be safe and independent and to stay in their own homes. I would like to see simplification of the current system; with seven funding streams, it is difficult for local authorities, so, imagine how hard it is for older people to navigate through those.”¹⁶

38. A number of witnesses also referred to the Welsh Government’s Social Services and Well-being Bill and whether provisions in that Bill could result in a more effective adaptations system. The WLGA said:

¹⁵ Oral Evidence, 27 February 2013

¹⁶ Oral Evidence, 27 February 2013

“[...] the social services Bill, moving forward, will look to put a duty on local authorities around advice, information and wellbeing, so there will be opportunities. This will be an important aspect of ensuring that people’s wellbeing is being catered for. So, if it is not there across the 22 now, the social services Bill will obviously ensure that it is there in the future.”¹⁷

Impact of Welfare Reform

39. Contributors to this inquiry referred to the impact of welfare reform. Disability Wales suggested that some disabled people were using their DLA to pay for small adaptations and this could be affected by the proposed reforms.¹⁸

40. Disability Wales also raised concerns about the impact of housing benefit reform on people living in accommodation that had been adapted to meet their specific needs:

“We are becoming particularly concerned about the impact on disabled tenants in social housing. Those tenants who have had disabled facilities grants to make various adaptations to their properties who are currently living in a two-bedroom bungalow or flat—or house in some cases—now risk losing that home, when it has taken many years to make the property accessible. The fact is that limited options are available for them to transfer to another home. So, that needs to be looked at as well.”¹⁹

41. The impact of housing benefit changes on the business plans of housing associations and, in particular, the potential for this to impact upon their borrowing costs (and therefore the amount they have to spend on adaptations) was also highlighted.

Minister’s view

42. In oral evidence to the Committee, the Minister acknowledged that improvements could be made, but said that some progress had been made since recent reviews:

¹⁷ Oral Evidence, 21 March 2013

¹⁸ Oral Evidence, 7 March 2013

¹⁹ Oral Evidence, 7 March 2013

“First, I think that it is important that you are doing a review into DFGs and the grants system because it was evident that improvements could be made. It is clear to us, following the report that we commissioned in 2010, outlining the delivery of the adaptations, that we have come some way in terms of improvement. The general trend across Wales for delivery is one of improvement, showing a 45% improvement rate since 2006, reducing the average time from 593 days to 325 days. That comes well within the statutory guidance of DFGs in terms of the Housing Grants, Construction and Regeneration Act 1996.”²⁰

43. On the issue of whether or not the Welsh Government should intervene more directly, the Minister said that, while the Government did not have powers to intervene directly in relation to DFGs, the Local Government (Wales) Measure 2011 included provisions to “drive improvement forward.”

44. In terms of encouraging good practice, the Minister said:

“I have always been one to push best practice; where we have good value and good outcomes, we should be sharing that across the board. We have clearly gone some way to delivering that, as indicated by the figures that I gave you earlier; however, the picture is slightly complex. I do not think that we fully understand the best delivery mechanism. So, what we are trying to understand at the moment is whether, in relation to the DFG, the physical adaptations grant, and the housing revenue accounts—which all link together—we are getting best value for money and also best delivery for our money?”²¹

45. The Minister also felt that the guidance on DFGs was clear and that “there is no ambiguity in the advice we are giving”:

“As we have seen, some people deliver on the guidance, and given that it is the same guidance being issued, I do not accept that it is flawed.”²²

²⁰ Oral Evidence, 17 April 2013

²¹ Oral Evidence, 17 April 2013

²² Oral Evidence, 17 April 2013

Our view

46. We note that the evidence suggests that there has been an improvement in performance in relation to DFGs over recent years. It is clear that a number of Local Authorities have introduced measures to improve their systems and delivery times. However, much of this evidence was based on improvements recorded by the performance indicator. It should be noted that a number of witnesses, including representatives of Local Authorities, suggested to us that the performance indicator was not robust. We address this issue in detail later in this report.

47. We note that the Equality of Opportunity Committee previously recommended that the Welsh Government should report to an Assembly Committee on an annual basis on the adaptations system. We believe that improvements need to be made as a matter of urgency and we feel that progress needs to be monitored appropriately. We therefore feel that the Welsh Government should report back to this Committee on an annual basis on progress in improving the system and on progress in delivering the recommendations in this report.

48. In terms of leadership, we believe that the Welsh Government should do more. We believe that it should, as a starting point, set out minimum standards for delivery of adaptations services. We feel that the standards should include specific targets for delivery times. We expect the Welsh Government to put in place measures to ensure that those standards are met. We will, as set out above, expect the Welsh Government to report back to us on progress.

49. We were concerned by the possible impact of welfare reform on adaptations services. We feel that the Welsh Government should ensure that the impact of these reforms are kept under review. We also feel that Local Authorities need to ensure that they are making full use of discretionary housing payments to help tenants living in adapted housing.

Recommendations

The Welsh Government should report back to this Committee on an annual basis on progress against the recommendations in this report and on improving the adaptations system generally.

The Welsh Government should, in consultation with Local Government and social housing providers, set out what it believes are appropriate standards for delivery of the different types of adaptations services, including targets for delivery times and should ensure that all Local Authorities meet that standard.

The Welsh Government should continue to keep under review the impact of welfare reform on social housing. In so doing, the Welsh Government should remind Local Authorities to make appropriate use of discretionary housing payments to help tenants living in adapted housing, and to have regard to guidance on this from the Department for Work and Pensions

4. The adaptations system

Introduction

50. One of the key issues to emerge during our inquiry was the complexity of the current housing adaptations system, with different funding streams applying across tenures, with some being means tested while others were not.

51. Although waiting times for Disabled Facilities Grants (DFGs) were a key factor in undertaking this inquiry, this grant is only one of a number of ways in which adaptations can be funded in Wales. The funding stream that is used to finance an adaptation depends on a range of factors, including the tenure of the occupier, who their landlord is (where applicable) and even the area in which they live.

The legislative context

52. Disabled Facilities Grants (DFGs) are statutory grants provided for in the *Housing Grants, Construction and Regeneration Act 1996*. Providing an applicant is eligible, and subject to any means test, the applicant has a legal right to the grant from their local authority.

53. Local authorities are also able to provide funding for adaptations using their discretionary powers under the *Regulatory Reform (Housing Assistance) (England and Wales) 2002 Order*. The 2002 Order amended the 1996 Act to confer wide ranging powers on local authorities to provide assistance and enables them to supplement mandatory DFGs in any way they deem appropriate.

54. Other legislation, including the *Chronically Sick and Disabled Persons Act 1970*, and the *Children Act 1989*, also include provisions dealing with housing adaptations.

55. Other adaptation programmes, such as Physical Adaptation Grants, Rapid Response Adaptations and Independent Living Grants are provided on a non-statutory basis.

The different ways of providing adaptations

56. Disabled Facilities Grants (DFGs) are mandatory grants provided by local authorities that can provide up to £36,000 of adaptations. They are funded from general capital funding provided to local

authorities, within which there is a notional amount allocated for housing. However, this funding is unhypothecated so does not need to be spent on DFGs, or indeed on housing. It is therefore the responsibility of local authorities to make funding available. DFGs can be claimed by tenants across tenures, or owner occupiers, and are subject to a means test, except where the disabled person is a child or young person.²³ Where a DFG is awarded, the local authority may register a charge on the property, which means that if it is sold within 10 years some of the grant must be repaid.

57. Physical Adaptation Grants (PAGs) - adaptations for housing association tenants can be funded by a Physical Adaptation Grant. PAGs are funded from the Social Housing Grant programme budget subject to a maximum expenditure limit set by the Welsh Government (currently £8.5 million). PAGs cannot be accessed by housing associations created following a stock transfer (also known as a Large Scale Voluntary Transfer or LSVT). Those LSVT landlords would be expected to have made provision within their business plan for adaptations so will not receive additional funding for that purpose. However, those business plans are supported by Welsh Government funding for up to 30 years. This means they receive an agreed amount of funding each year at the same level the local authority would have received Major Repairs Allowance (had they not transferred their housing stock).

58. Local authorities can use their own capital resources, including Major Repairs Allowance, to fund adaptations in their own stock. Local authorities can also use their discretionary powers to fund grants for owner occupiers or private tenants, or indeed to top up mandatory DFGs where works are going to cost more than £36,000. Housing associations fund minor adaptations in their stock from their own resources.

59. The Rapid Response Adaptations programme, managed by local Care and Repair agencies, facilitates a fast response to specific needs for owner occupiers and private tenants by providing minor adaptations such as ramps and handrails, to enable people to return to

²³ The exemption for disabled children was introduced from 30 September 2005 when the Housing Renewal Grants (Amendment) (Wales) Regulations 2005 came into force. The Welsh Government also extended the exemption to take account of 'Young Persons' on 20 October 2006.

their own homes following hospital discharge and to prevent them going into hospital in the first place.

60. The Welsh Government's Independent Living Grant programme was launched in 2011 with the aim of reducing waiting times for DFGs and funding adaptations costing between £1,000 and £10,000. This is also targeted at owner-occupiers and private tenants and is also managed by Care and Repair. An additional £1 million funding was made available for the programme in 2012-13.

61. In some areas, social services departments also assist with small scale adaptations.

General views of the adaptations system

62. Many respondents commented on their experiences of a bureaucratic and overly complex adaptations system in terms of applying for a grant, administering the system and delivering the adaptations. This was attributed to a range of factors including the large number of funding streams and their individual eligibility criteria. These criteria are based on tenure, age, diagnosis, personal contributions and the complexity of the adaptation needed.

63. As the College of Occupational Therapists (COT) remarked, it is not always clear which funding stream will, or should, be used:

“At the moment, there are five or six different means of obtaining an adaptation, depending on the tenure of the property that you are in. You have the disabled facilities grant, the physical adaptation grant, and the independent living grant; those authorities that have retained their stock use their own moneys; and then you have the stock transfer for which money has to be used from the business plan and there is then no access to any other additional moneys. Such a complex range of funding routes means that people will drop through that system.”²⁴

64. In written evidence, the Older People's Commissioner noted that the system was

²⁴ Oral Evidence, 27 February 2013

“[...] a disjointed and complex system which needs fundamental review and reform to meet modern needs. Local authorities in Wales are subject to statutory duties to provide effective Disabled Facilities Grants and also have discretionary powers to deliver a wide range of adaptations services as they see appropriate. Public, private and voluntary agencies fulfil different, sometimes overlapping roles. These multiple routes can create unnecessary complexity and unfairness, and create bureaucratic processes which often inhibit a common sense response to a problem.”²⁵

65. In written evidence, Nigel Appleton referred to the complexity and bureaucracy of the current adaptations system:

“The arrangements for the provision of assessment and delivery of adaptations to dwellings to meet the needs of disabled people seem uniquely structured to encourage delay, bureaucracy and fragmentation in the delivery of service. Through the initiative and imagination of individuals the system is, in many cases, made to work for the benefit of disabled people. Where goodwill, adequate financial resources, inter-disciplinary trust and corporate leadership are absent disabled people suffer delay and compounded risk for themselves and their carers.”²⁶

66. Organisations noted that particular issues contributed to the complexity of the overall system, including means-testing, assessments, working with contractors and balancing customers’ needs and expectations against bureaucracy.

67. It was also noted that there were inconsistencies in delivery times across tenures and funding programmes. As the only performance indicator is for DFGs, robust comparison is difficult.

68. A number of witnesses suggested that there was not a “level playing field” for tenants seeking housing adaptations. Age Cymru told us:

“That really is at the heart of the matter, and it is why we and other organisations that have been a part of this debate are

²⁵ Written Evidence, HA 24

²⁶ Written Evidence, HA 25

indicating the necessity for a single process that is tenure blind. The tenured basis to the systems currently in place and the connections that that has to the funding structures that are currently in place bring inherent inequities. Addressing that issue with a single tenure-blind approach to the administration of adaptation work in the future probably would cancel out a lot of that inequity.”²⁷

69. The Wales Audit Office said:

“If you are a social housing tenant you have greater support provided by your landlord to assist you through the process. They manage and control the delivery of the building works to physically improve the building. If you are an owner-occupier or private tenant, it is slightly more onerous and difficult. It depends very much on the system that the authority uses to secure contractors; if they act as an agent on behalf of the applicant, that assists them through the process. However, in some instances, they may just provide a list of contractors to select from and then the onus is on that disabled or vulnerable person or their family to work through the process. So, I think that there is a difference between tenures.”²⁸

70. Age Cymru suggested that a tenure-blind approach should be adopted:

“The tenured basis to the systems currently in place and the connections that that has to the funding structures that are currently in place brings inherent inequities. Addressing that issue with a single tenure-blind approach to the administration of adaptation work in the future probably would cancel out a lot of that inequity.”²⁹

Social housing and PAGs

71. The Committee heard limited evidence on issues within retained local authority stock, although it was highlighted that there is no longer a performance indicator for local authority performance in this area.

²⁷ Oral Evidence, 7 March 2013

²⁸ Oral Evidence, 13 March 2013

²⁹ Oral Evidence, 7 March 2013

72. Community Housing Cymru noted in their paper that there is “no single standard or process for adaptations within Wales.” They went on to note that even within the housing association sector there are variations, with housing associations established following stock transfer (known as Large Scale Voluntary Transfer landlords or LSVTs) not able to access PAG funding.³⁰

73. Although the PAG programme was hailed as a success by the housing association sector it is acknowledged that there are still some delays. Some of these delays were attributed by CHC to a lack of resources from within the Occupational Therapist sector.

74. Housing associations gave evidence to the Committee and, although practice varied between landlords, stated that adaptations of up to £1000 could be funded from their own resources without resorting to a Physical Adaptations Grant and therefore minimising bureaucracy.

75. Specifically in relation to PAGs, Community Housing Cymru noted that:

“There are still layers of bureaucracy in the PAG system such as tendering process where frameworks [agreements] are not in place which also impact on the end to end time of delivering the adaptation.”³¹

Small Scale Adaptations

76. Care and Repair outlined the benefits of progressing small scale adaptations outwith the DFG process:

“Probably, the biggest issue is the fact that you still have quite small works going into that system. I think that the issue is to take as many of the smaller works out of that system as possible, to do it outside of that bureaucratic system. I mentioned local authorities’ powers to do this, through a regulatory reform Order. They can put in place their own

³⁰ Written Evidence, HA 23

³¹ Oral Evidence, 13 March 2013

systems; it does not have to be means-tested, and it does not need the same bureaucracy.”³²

77. The College of Occupational Therapists also supported providing straightforward adaptations quickly without a substantial administrative burden and noted that they had recommended providing simple adaptations without requiring an OT assessment, providing the staff who carry out assessments had appropriate training. They said:

“I think it was in 2006, or it could be earlier, that the College of Occupational Therapists published ‘Minor Adaptations Without Delay’, which offers clear guidance on how it is possible to provide simple adaptations without using an occupational therapy assessment. We would absolutely advocate that that needs to be done. However, you must have good supervision, training and support for those staff so that, if they get into a situation where they arrive at someone’s house and spot that there are potential dangers and that, potentially, people do need more, they have a route for coming back and getting advice and that we make sure that services are always fail safe.”³³

Rapid Response Adaptations Programme

78. Both the Rapid Response Adaptations Programme and the pilot Independent Living Grant Programme were seen as effective models that could be replicated and used more widely. Care and Repair suggested that the successful Rapid Response Adaptations programme could be expanded to include the social housing sector and gave an example of the potential inequity of the current system:

“The problem at the moment is that you may have a health professional who has two people in beds next to each other and is trying to get them home into a safe environment. However, one is a homeowner and one is a social tenant, so while one of them is eligible for rapid response, the other is not.”³⁴

³² Oral Evidence, 7 March 2013

³³ Oral Evidence, 27 February 2013

³⁴ Oral Evidence, 7 March 2013

79. Care and Repair highlighted that the funding for Rapid Response Adaptations is not sufficient:

“We have been delivering a rapid response adaptations programme for 10 years. Really successful infrastructure and partnerships are in place with health, social care and housing. Yet, despite the demand for it and the fact that all the professionals refer into it, the money runs out. It is a question of whether we need to think of new ways of doing it or should we just put resources into something that works. That should be the case for the rapid response programme.”³⁵

80. The Rapid Response Adaptations Programme was recognised as a model of best practice that could potentially be offered to people across tenures although there was not universal agreement on this point. Care and Repair said:

“There is currently no programme that goes across tenure. If you think about the lowest cost adaptations that the rapid response programme deals with, you will know that there is an average cost of £150 and an eight-day average waiting time. Would it not make sense to do that particular one across tenure because that is quite easy? I think that that would be easy to implement. I think that it becomes more complex to implement cross-tenure schemes as the cost of the work increases.”³⁶

81. Indeed, this was supported by the College of Occupational Therapists, who said that stakeholders had agreed in a recent event that “we need to look at whether something as effective as the rapid response adaptation programme can be made available to all ages and all tenures, because that has been highly effective.”³⁷

Single point of access

82. A number of witnesses suggested that an effective way to simplify the system for the customer would be through a single point of entry to the system. Care and Repair told us:

³⁵ Oral Evidence, 7 March 2013

³⁶ Oral Evidence, 7 March 2013

³⁷ Oral Evidence, 27 February 2013

“With a local government hat on, I think the most sensible way to deliver the services would be through a single team that brings together housing people who work in private sector housing and colleagues who work on council housing adaptations. Even within housing there is separation, so bring those together, bring the OTs into that team, and have a single point of access for people—at least into the local authority service. If you get that access point, then somebody living in that county knows, ‘Right, that is where I go’. It is not a matter of having to ask, ‘Do I go to the OT? Do I go to private sector housing? Do I go to my landlord or housing association?’ It is, ‘That is where I go’.”³⁸

83. Community Housing Cymru emphasised the need for a single point of access and stressed the difficulties people who needed to use the system might have, saying “I think that they are confused because if they do not know at the first point of contact who to go to, they will not even access an adaptation.” They went on to say how they envisaged such an approach working in practice:

“[...] we would want one point of access, with collaboration between each of us, recognising that that will probably bring more efficient and faster improvement to the services. It is the first point of contact that we would want, with collaboration then among the key sectors.”³⁹

Provision of Information

84. Many participants in the inquiry voiced concerns about a lack of information on the adaptations process. Care and Repair said that progress had been made in this area:

“The most significant outcome of that particular review was the information leaflets that we produced with the Older People’s Commissioner for Wales, Age Cymru and the College of Occupational Therapists. I think that one of the recommendations of the review was the need for better information and advice for people who need to access adaptations. We produced hard copies of that, which we

³⁸ Oral Evidence, 7 March 2013

³⁹ Oral Evidence, 13 March 2013

distributed across Wales via care and repair agencies and local authorities, and a web-based leaflet. I am not sure whether the committee was aware of that. Although I would say this, would I not, it is a good source of information. All the information in it is accurate. However, as with all information, the important thing is that it reaches the people who need it. I suppose that we need to look at whether that the people who need adaptations, whoever they are—be they owner-occupiers, council tenants or housing association tenants—are getting that information.”⁴⁰

85. Tai Pawb noted that the information leaflet was primarily targeted at the older population and that more information needed to be made available to the wider disabled population.⁴¹

86. Age Cymru noted in oral evidence that they provide a range of guides for older people, and that many of the enquiries their advice line receives suggest people do not know what routes adaptations can be provided under, or the types of adaptations they can have access to.⁴²

87. The Wales Audit Office suggested in their written submission that “Better information could be provided at the first point of contact with the client, and the local authority could get all the information they need from the client at that point.”⁴³ They expanded on this in oral evidence:

“One of the areas where we have made recommendations has been around the kind of information that is available to people. Going back to the Neath Port Talbot scenario, a lot has been made of the personal contact at the time, which is not written documentation, but advice about the options that are available and the impacts, because sometimes, with means testing, information about what it is likely to cost you, if that is provided early enough, might actually dictate what choices you are able to exercise as a potential grant applicant.”⁴⁴

⁴⁰ Oral Evidence, 7 March 2013

⁴¹ Oral Evidence, 13 March 2013

⁴² Oral Evidence, 7 March 2013

⁴³ Written Evidence, HA 11

⁴⁴ Oral Evidence, 13 March 2013

88. Tai Pawb told us that the provision of information was inconsistent, saying that:

“It depends on the route you are going down and the local authority or housing organisation that you are with. Some housing providers do not have any of that information on their websites—certainly nothing that is accessible. Others will have contact details, where you have to physically go to speak to somebody. Local authorities tend to have a quite detailed explanation of the process online, but, again, it is about making that accessible. Wider than that, there are issues about whether the people who you have come out are skilled in providing information for people with learning disabilities and things such as that, and I would question whether they are British Sign Language users.”⁴⁵

89. The WLGA noted the proposed duty on local authorities to provide advice on wellbeing (included within the Social Services and Well-being Bill) will link in with home adaptations.⁴⁶

Minister’s View

90. In oral evidence to the Committee, the Minister emphasised the importance of collaboration in delivering adaptations services. He said:

“On the care pathway following the exit out of the health service, there is a huge synergy and relationship between health and social services within local authorities. Some local authorities do it really well, but some could do better. That is what we have to try to get underneath. It has always been the case that an action by one department has a consequence for another department. We must ensure that we try to alleviate some of the pressures on health by better use of DFGs et cetera, so that we can get people back into their own homes, if that is appropriate.”⁴⁷

91. In terms of expanding the rapid response service across tenure, the Minister said this was being considered:

⁴⁵ Oral Evidence, 13 March 2013

⁴⁶ Oral Evidence, 21 March 2013

⁴⁷ Oral Evidence, 17 April 2013

“We have already had discussions with our colleagues in health, and those discussions are ongoing. We have tried to identify a clear means of measuring the success of the rapid response adaptations programme so that we can show evidence of its benefits. That work is ongoing, and we are looking at it very closely.”⁴⁸

Our view

92. The evidence we received suggested overwhelmingly that the adaptations system is overly complicated, with different solutions available depending on tenure, age etc. While we feel that it would not be practical to replace the current system with a new tenure and age-blind system, as suggested by some witnesses, we do feel that improvements can be made.

93. When we spoke with service users during our inquiry, one of the key messages they gave us was that the adaptations system should be more focused on their needs. They felt that the complexity of the system and the bureaucracy associated with it prevented this from happening. Indeed, we heard that some users were not even entering the system for this reason.

94. A number of witnesses suggested that there should be a single point of entry into the system. We feel that this would go some way towards making the system more user friendly. Our vision for this approach is that a user will be able to enter the system through a single point of contact (for example by telephone or internet) and the complicated work of identifying an appropriate solution will be undertaken by professionals. We also think this will enable a more joined up approach.

95. A number of other recommendations are particularly relevant in ensuring that this approach is effective. In Chapter 5, we recommend that all Local Authorities should use an agency approach to deliver DFGs. In addition, we are recommending that the Welsh Government should explore the possibility of extending the rapid response adaptations programme across ages and tenures. We have also recommended that the Welsh Government should promote and extend

⁴⁸ Oral Evidence, 17 April 2013

the fast-track process for small adaptations processed outside the DFG system.

96. Finally, we have recommended that more ~~and better~~ information should be available for service users, particularly about their role and rights once they are in the system.

Recommendations

The Welsh Government should engage with the WLGA, CHC, Care and Repair and Occupational Therapists to explore the possibility of introducing a single point of entry to the system within each Local Authority area, where such arrangements are not already in place.

The Welsh Government should ensure that adequate information is available on the various aspects of the adaptations system. This should include information clarifying the role and rights of clients in relation to adaptations delivered under DFGs.

The Welsh Government should extend and promote more actively the fast-track process for small scale adaptations processed outside the DFG system.

The Welsh Government should explore the possibility of making the rapid response adaptations programme available across all ages and tenures, and undertake analysis of the financial implications of such an approach.

5. Disabled Facilities Grants

Introduction

97. As outlined in the previous Chapter, Disabled Facilities Grants are one of a number of ways of providing adaptations. The purpose of this Chapter is to look at issues around the DFG process.

Variations in delivery times of DFGs

98. While the accuracy and usefulness of performance indicators in relation to adaptations is disputed (this issue is addressed in Chapter 6), the indicators nevertheless demonstrate two things: that a number of Local Authorities are taking too long to deliver DFGs; and that there is significant regional variations in average waiting periods for grants.

Table 1: PSR/002 Delivering Disabled Facilities Grants (2011-12)⁴⁹

Local authority	Average wait
Isle of Anglesey	309
Gwynedd	281
Conwy	180
Denbighshire	219
Flintshire	404
Wrexham	274
Powys	385
Ceredigion	447
Pembrokeshire	318
Carmarthenshire	310
Swansea	339
Neath Port Talbot	531
Bridgend	251
The Vale of Glamorgan	399
Cardiff	220
Rhondda Cynon Taf	225

⁴⁹ This is the **average** number of calendar days to deliver adaptations through the DFG process. It therefore includes all types of adaptations. The number of calendar days taken to deliver a DFG should be counted from the date of the client's first recorded contact with the local authority, relating specifically to an adaptation, for which DFG is subsequently offered, to the 'certified date'. Alternatively, in the case of an existing client, the starting point should be the date on which the need for an adaptation for which DFG is subsequently offered is first raised, either by the client or the Authority.

Merthyr Tydfil	175
Caerphilly	333
Blaenau Gwent	306
Torfaen	413
Monmouthshire	311
Newport	638
Wales	326

Source:StatsWales

99. Many witnesses said that, using the performance indicator as a gauge, there had clearly been an improvement in average waiting times in recent years. Witnesses also suggested that delivering an adaptation in the shortest possible time did not necessarily guarantee the quality or appropriateness of an adaptation. However, it was acknowledged that there were avoidable delays in the system.

100. A number of witnesses suggested that delays in the adaptations process were not always attributable to failings by the local authority, or indeed an inherent problem with the statutory framework. The Housing Technical Panel noted:

“There is no problem with the system and the processes that we have to follow. You will find that the problem is where cases just sit, and I would imagine that it is for resource reasons in most cases. We can complete the process, from start to finish, for a straight-flight stairlift for example, in around 80 days, as a best-case example. The problem lies in the cases where the case file sits in a tray or in a waiting lounge, whether it is for capital funding or some kind of other resource to go in, and not with the use of best practice.”⁵⁰

101. A representative from Pembrokeshire County Council referred specifically to the means test as a factor causing delays:

“When you consider the complexity of the resources test and the number of officers who are involved in that, and the time

⁵⁰ Oral Evidence, 27 February 2013

taken to do it, it is one of those areas in the system that is bureaucratic, complex and creates delay.”⁵¹

102. A number of respondents to the Committee’s consultation noted that variations in delivery times for home adaptations were ‘inevitable’ in a complex system involving many different agencies and departments.

103. The Housing Technical Panel emphasised that it was natural for there to be variations in terms of delivery times and approaches across Local Authorities:

“There are different problems in different local authorities. It may take longer to get around, for geographical reasons, in some local authorities. There are different health profiles, different customer profiles, and different financial circumstances with those customers. There will always be differences with 22 local authorities because of the very nature of those authorities. There may be some issues around practice, but I think that that gap between local authorities is narrowing.”⁵²

104. The Wales Audit Office (WAO) commented that when interpreting data on delivery times, it was important to recognise that adaptations services were often provided to very vulnerable and disabled people whose needs and requirements could change over the lifetime of a DFG application. The WAO also highlighted that:

“[...] a customer’s decision to pursue an adaptation can be quite difficult and may take time which can add to the length of time taken to deliver the works. In our experience, there are examples where councils will close cases while they wait for an applicant to agree to progress with the adaptation work, only to then start the whole process again when they decide to proceed.”⁵³

⁵¹ Oral Evidence, 21 March 2013

⁵² Oral Evidence, 27 February 2013

⁵³ Written Evidence, HA 11

Variations in approach

105. The evidence suggested significant differences between how local authority adaptation services operated between areas. Some areas had “one stop shops”, while others offered “agency” services to help the disabled applicant through the process. Others appeared to have neither.

Small scale adaptations

106. As outlined in Chapter 4, many witnesses advocated removing straightforward low cost adaptations from the DFG process entirely – something that was recommended by the Jones Review in 2005.

107. It was suggested that small adaptations should be provided through alternative routes using local authorities’ discretionary powers under the *Regulatory Reform (Housing Assistance)(England and Wales) Order 2002*. In response to a query as to why local authorities were not using these powers, Care and Repair said that some, but not all, did.⁵⁴

In-house agencies

108. Conwy Council commented that relying on external agents to progress applications on behalf of applicants is “fraught with difficulty”,⁵⁵ and noted that timescales had improved since the Council has been using an internal (arm’s length) agency to assist in delivering DFGs. Merthyr Tydfil Council also noted that:

“Many local authorities do not operate their own in-house home improvement Agency. This leaves the local authority in a difficult position as it is at the mercy of either the client or their appointed private Agent – to complete all the paperwork necessary for the DFG, compilation of tenders, technical drawings, building regulation and planning applications.”⁵⁶

109. The Housing Technical Panel felt that the use of in-house agencies could lead to significant improvements in service delivery:

⁵⁴ Oral Evidence, 7 March 2013

⁵⁵ Written Evidence, HA 21

⁵⁶ Written Evidence, HA 02

“[...] in many authorities now, the applicant effectively just signs on the dotted line and all the worry and stress are taken away. The appointment of the builders and the scheduling of the work is all at arm’s length to the client, and all that they need to know is the start date and the builder and they are away to go. When the local authority is in control of the whole process, it works that much quicker as opposed to when it is given to the client and the client has to appoint a builder or has to worry about scheduling the works et cetera. That is when timescales can increase significantly.”⁵⁷

Contractors

110. Merthyr County Borough Council noted issues with how local authorities procure contractors, stating that this can have a “massive negative impact on delivery times.” They also state that:

“...those local authorities who choose to tender each and every job will inevitably take much longer to deliver adaptation works and those which have a Framework arrangement or a pool of certified contractors from which to appoint a contractor.”⁵⁸

111. The Wales Audit Office made the following observations relating to procurement issues:

- Some local authorities are still procuring through single tender contracts, rather than framework agreements, and this adds to delays; and
- Formal accreditation systems for the contracting of DFG works are often lacking in terms of their focus in a number of areas including standards of customer care (such as keeping appointments, keeping the site tidy and controlling noise).⁵⁹

Best Practice

112. The Housing Technical Panel stated that best practice was already known and shared by a variety of means, including through meetings of the Technical Panel itself. However, one Local Authority suggested

⁵⁷ Oral Evidence, 27 February 2013

⁵⁸ Written Evidence, HA 02

⁵⁹ Oral Evidence, 13 March 2013

that, as far as best practice is concerned, one size does not necessarily fit all.

113. Some local authorities had undertaken their own reviews of the process, most notably Neath Port Talbot with its “systems review”. Commenting on the work carried out by that Local Authority, the Wales Audit Office said:

“That led to the authority broadening its view and it discovered that the DFG was part of the solution, but not always the solution and that it needed to take a wider picture. You will see in Neath Port Talbot’s submission that it was breaking down the process into its core component elements and it was very much trying to measure what it was doing based on whether what it had done had been appropriate for that particular individual. We did not find any benchmarking or any discussion with other authorities when we were doing the work with these three authorities. It tended to be a process-orientated view of what they were doing and how they could do it more quickly.”⁶⁰

114. Contrary to the views of some local authority representatives, Age Cymru suggested that best practice was not being implemented consistently and that this indicated the need for “...something at a higher level to ensure that that is taken forward.”⁶¹

Scrutiny in Local Authorities

115. The WLGA referred to the development of good practice in the training of scrutiny chairs. It was felt that this could lead to improved performance. The WLGA said:

“More recently, we have started establishing networks of scrutiny chairs—that is, those who would scrutinise that performance within an authority. At the beginning of this year, we had a full day’s seminar for the chairs of housing scrutiny committees. The idea is that we can provide some of those examples, Joyce, to those that will then scrutinise cabinet members in the ruling administrations. So, that information about practice is shared more broadly to enable them to be

⁶⁰ Oral Evidence, 13 March 2013

⁶¹ Oral Evidence, 7 March 2013

informed about those opportunities, to pick that up and to question that internally with the authority as well.”⁶²

Corporate Leadership

116. A number of witnesses suggested that corporate leadership was fundamental to an effective system. The Older People’s Commissioner said:

“One of the things that I think is missing sometimes in Wales—is it is not always the case—is strong corporate prioritisation and strong corporate leadership. I have been listening to some of the debate; there are 1,001 little bitty things that need to come together and what we need is strong corporate leadership, public corporate leadership and a public commitment to what a good job well done on aids and adaptations for older people will look like.”⁶³

117. In their written submission, the Wales Audit Office suggested that under-performance could be a result of “underpinning management arrangements.”⁶⁴

118. Nigel Appleton said that delays were “[...] most evident where there is little corporate ownership or leadership within the local authority process, where it is seated within the silos of housing, legal services, social care and so on.” He went on to note the problems that arise from adaptations being seen only as a housing issue, emphasising the need for a “holistic approach”. He suggested that improvements could be delivered by:

“[...] establishing the point of senior leadership within a local authority who will be accountable. My suggestion would be that an accountable officer should be identified in each local authority to carry the overall responsibility for identifying need and for delivering a response, irrespective of how that is funded, and irrespective of who actually does the delivery.”⁶⁵

⁶² Oral Evidence, 21 March 2013

⁶³ Oral Evidence, 27 February 2013

⁶⁴ Written Evidence, HA 11

⁶⁵ Oral Evidence, 27 February 2013

119. Care and Repair also called for better corporate accountability and referred to a senior leader who would take responsibility for delivery of the service and to ensure that other teams work together:

“So, if you have accountability for DFGs, for example, in a housing department with a housing manager, it is incredibly difficult for that person to have influence over, for example, social care colleagues—the occupational therapy team—or planners to fast-track planning applications. Corporate leadership would be a central point of accountability, possibly within the chief executive’s department or wherever it is, for somebody who says, ‘I am accountable and I have authority to make sure that we pull all the different elements from the local authority that are needed to make this into a better service.’”⁶⁶

Collaboration

120. As outlined above, witnesses felt that corporate leadership was vital to drive forward the collaboration that is necessary to ensure that the system works effectively. The Wales Audit Office told us:

“The main collaborative work tends to be with social care and the housing service. The only one that we are aware of that has an integrated service—we have done work there recently—is Torfaen. However, one of the by-products of that is that its performance, like Neath Port Talbot with the lean system thinking review, has gone down in recent years. So, there has been an increase in time, but I think that that is part of the process of working through how to integrate the two services.”⁶⁷

121. The Housing Technical Panel referred to the management of resources in this context:

“[...] one of the issues is that you have to really understand what is causing delays, and if you have the wrong idea about what is causing the delay, and you buy in extra resource—say you buy in more OTs and you shift that waiting list—then you suddenly send an enormous pile of referrals across to the grants department, and the grants department suddenly gets a

⁶⁶ Oral Evidence, 7 March 2013

⁶⁷ Oral Evidence, 13 March 2013

delay. You have to look at it as an entire process. If you know that you have a particular area and you have capacity to deal with it, then that is a solution.”⁶⁸

122. While we heard there was some integrated working between service areas, in particular housing and social services, there was less evidence of integrated working involving health services:

“Health sees DFGs as a solution; that comes up frequently in discussions on an operational level. Strategically, I think that it is recognised as having more of an important role. However, at this time we are not seeing a significant impact in that relationship that is using DFGs in that way.”

123. The College of Occupational Therapists noted that most occupational therapy services were developing improved partnerships across health housing and social care services in their area and between neighbouring local authorities. The All Wales Occupational Therapy Advisory Forum (OTAF) had produced a progress report in respect of integrated occupational therapy services outlining some of the innovative developments.⁶⁹

Occupational Therapists

124. As in previous inquiries, the important role played by Occupational Therapists (OTs) was recognised by many witnesses.

125. The evidence highlighted that for OTs, DFGs are only one of a range of acceptable outcomes for disabled people, estimated in oral evidence by the COT to be somewhere between 20 and 25 per cent of referrals. Other outcomes that can be delivered by OTs include re-ablement services, advice, signposting and other types of support.

126. The College of Occupational Therapists (COT) acknowledged that there had been a rise in the number of OTs employed in local authorities, including those based within housing adaptation services. However, it was also drawn to the Committee’s attention that the numbers vary significantly between authorities with some authorities only employing two OTs and the biggest having 21. The COT went on to note:

⁶⁸ Oral Evidence, 27 February 2013

⁶⁹ Written Evidence, HA 09

“They [OT services] are small and frail establishments; not very robust. It only needs one of those two people to go on maternity or sick leave and the whole waiting list grows again. We would say that you do need to look carefully at whether there is sufficient capacity, and whether we have enough OTs.”⁷⁰

127. The Committee heard that while some OTs are based within local authority adaptation services, few housing associations employ their own OTs. In written evidence Community Housing Cymru highlighted the effective co-ordination of OT resources as an on-going issue, and they stated that local authorities should consider pooling resources to address inconsistencies.⁷¹

128. Many respondents recognised that high demand for Occupational Therapist (OT) assessments contributes to longer waiting times, but many also noted the importance of ensuring the assessment accurately determines the customer’s needs rather than fast tracking the process for the sake of the performance indicator.⁷² Torfaen County Borough Council said that:

“...the level of OT support can have a significant impact, in some areas there is dedicated OT support for housing adaptations, but not in others. Waiting lists for assessments that need a qualified OT can be problematic and can hold up the delivery of aids and adaptations.”⁷³

129. The College of Occupational Therapists highlighted that the Care Council for Wales collects workforce information on occupational therapists as part of the planning for the whole social care workforce.⁷⁴

130. The evidence suggested that OTs were not used in all cases where adaptations were needed. For example, for fast track adaptations it may be advisable to use suitably trained local authority or housing association staff to undertake the assessment. Community Housing Cymru elaborated on this point:

⁷⁰ Oral Evidence, 27 February 2013

⁷¹ Written Evidence, HA23

⁷² Written Evidence, HA09

⁷³ Written Evidence, HA16

⁷⁴ Oral Evidence, 27 February 2013

“There is a need to ensure the use of OT resources is effective. Where it works well, it is not necessarily replicated across all locations (e.g. trusted assessors for smaller adaptations, ensuring OT use for complex care cases etc). There is a need to clarify the OT staff role in respect of minor adaptations.”⁷⁵

Our View

131. It is clear that improvements have been made to the system over recent years. However, it is clear that progress has not been made quickly enough or consistently enough across Local Authorities. The timescales for the delivery of DFGs, with a Wales average of 326 days, are simply unacceptable. While we recognise that the delivery of a DFG can be subject to a number of complicated factors, we do not accept that they should be used as an excuse for such underperformance.

132. It is clear from the evidence that, although good practice is being implemented in a number of Local Authorities, this is not being done consistently. Because of this, we feel that the Welsh Government should conduct an audit of adaptations services to identify best practice and the extent to which it is being implemented. We expect the Welsh Government to report back to this Committee on its findings.

133. We were concerned to hear that some small adaptations were being processed through DFGs, rather than by Local Authorities using discretionary powers under the Regulatory Reform Act. We feel that this approach creates unnecessary bureaucracy and delays the provision of adaptations. We feel that there needs to be clear guidance from the Welsh Government on when Local Authorities should and should not use DFGs.

134. We note the evidence that the provision of agency services by Local Authorities for delivery of DFGs can have a positive effect on delivery times and the customer’s experience. We commend those Local Authorities that have introduced these measures. We feel that this should be seen as a model of good practice and have therefore recommended that all Local Authorities should move to an agency approach.

⁷⁵ Written Evidence, HA 23

135. In terms of the role of Local Authorities, we feel that Local Authority scrutiny committees should be encouraged to scrutinise the performance of their respective authorities. We feel that this is key to driving forward performance rapidly. In addition, each Local Authority should put in place a designated senior officer to take a corporate lead on adaptations. We feel that this, as suggested by witnesses, will ensure that improvements are implemented and drive forward collaboration.

136. Finally, in relation to the most important aspect of the system – the customer – we feel that more clarity is needed about what can be expected from the system. We have therefore recommended that each Local Authority should produce and publish a customer charter for adaptations, to outline its commitments to the residents of its area.

Recommendations

The Welsh Government should ensure that guidance for Local Authorities is clear on when an adaptation should be delivered via a DFG. This guidance should indicate that DFGs should be used only when it is the most effective and efficient way of delivering an adaptation.

The Welsh Government should require each Local Authority, working with local registered social landlords, to produce a customer charter, setting out its commitments to the residents of that area in relation to adaptations services.

The Welsh Government should encourage Local Authorities that have not done so already to move to an agency approach for DFGs as a model of good practice.

The Welsh Government should require Local Authorities to put in place a designated senior officer to take a corporate lead on adaptations.

The Welsh Government should encourage Local Authority scrutiny committees to scrutinise the performance of adaptation services in their areas at least once in a council term.

The Welsh Government should conduct an audit of adaptations services to identify best practice and the extent to which it is being implemented across Local Authorities and report back to this Committee on its findings.

6. Performance monitoring

Introduction

137. A key issue to emerge during the inquiry was performance monitoring. Witnesses made a number of suggestions for improving the performance indicators for DFGs and some raised serious concerns about the reliability of the current performance indicator.

138. The current performance indicator for DFGs (PSR/002) measures the average waiting time from first contact with the local authority to payment of grant. Another PI (PSR/009) provides a separate breakdown of average DFG waiting times for both adults and children and was introduced as a direct result of the 2009 recommendations. There is no national performance indicator showing adaptation waiting times for housing association or local authority tenants.

139. In terms of the impact of the introduction of the performance indicator for DFGs, Care and Repair felt that it had had a positive effect and told us:

“I think that the PI helped that, because the whole point of the PI was that it was not a departmentally led local authority PI, but a PI that was about the client perspective. It was the waiting time from the first point of entry into the local authority, wherever that was, until the work was finished. So, that helped. Colleagues in local government worked together, and, because it was a statutory PI, it was recorded corporately”⁷⁶

140. The College of Occupational Therapists echoed this view:

“I think that it is reasonable to say that waiting times have gone down, because there has been a focus on the performance indicator for the disabled facilities grant, but as we said in our evidence, that is only a focus on the DFG. We do not have an all-encompassing monitoring of the performance of all the different routes of adaptations.”⁷⁷

141. The Welsh Heads of Environmental Health Technical Panel noted that the Performance Indicator in relation to the delivery of DFGs had

⁷⁶ Oral Evidence, 7 March 2013

⁷⁷ Oral Evidence, 27 February 2013

shown a steady improvement since 2005/06, and that the level of consistency between authorities had, in their opinion, also improved:

“Members of the Housing Technical Panel assisted in the development of this performance indicator and from the [...] information it is clear that it has helped to improve delivery times. However based on our experience it remains a very basic indicator as to the quality the services being delivered. A number of local authorities have considered the value of adaptations delivered in terms of health improvement maintaining independence and overall satisfaction of the client.”⁷⁸

The narrow scope of the performance indicators

142. One of the issues raised by witnesses was that the indicator focuses only on DFGs and therefore does not give an accurate picture of the adaptations system. The Older Person’s Commissioner noted in her written evidence that:

“At present, the DFG is the only type of adaptation process for which there is a performance indicator; there is no common approach to monitoring the quality or impact of other adaptation grant routes.”⁷⁹

The effectiveness and reliability of the current performance indicator

143. Some Local Authorities suggested that the guidance for monitoring performance was being interpreted differently, with different interpretations of the start and end point of the process.

144. Age Cymru questioned the usefulness of the performance indicator:

“Point of entry to completion monitoring simply does not capture the experiences of individuals and give us the more textured detail of where systemic failings may be occurring and at what point. So, developing a far more robust monitoring and

⁷⁸ Oral Evidence, 27 February 2013

⁷⁹ Written Evidence, HA 24

evaluation process in relation to adaptations is absolutely critical.”⁸⁰

145. The Housing Technical Panel suggested that the performance indicator did not give a full or accurate picture of performance:

“We need to understand that it is an average. There is a story behind that. There was another PI, which we measured, for small-scale adaptations outside the DFG process, and we are talking about 10 to 15 days in terms of the small-scale stuff.”⁸¹

146. The College of Occupational Therapists noted that adaptations delivered by Local Authorities outwith the DFG process would not be reflected in the performance indicators:

“The Regulatory Reform [(Housing Assistance) (England and Wales)] Order [2002] has enabled local authorities to be more creative in providing adaptations or alternative solutions to achieve improved timescales. Examples of this are fast track schemes and relocation grants. Some authorities provide certain types of adaptation through a discretionary grant which removes the need for a means test. Others may use a DFG for a whole range of adaptations, including small works. None of this is made overt in the performance indicator.”⁸²

147. On this issue, the Housing Technical Panel said:

“In Carmarthenshire, we get 1,000 enquiries a year for DFGs, and only 200 end up with grants because there are other housing solutions for these people.”⁸³

148. The College of Occupational Therapists noted that the existing performance indicators did not differentiate between simple and complex adaptations. Advocating that the performance indicator should be broken down to enable better analysis of where the delays are in the system, the College of OTs said:

⁸⁰ Oral Evidence, 7 March 2013

⁸¹ Oral Evidence, 27 February 2013

⁸² Oral Evidence, 27 February 2013

⁸³ Oral Evidence, 27 February 2013

“The whole process needs to be measured, but you need to be able to identify very clearly what parts need some amendment in order to slick them up and make them more efficient.”⁸⁴

149. The Technical Panel also suggested that the PI should be “more sophisticated”, and that breaking it down would enable “bottlenecks” to be identified.⁸⁵

150. In further written evidence to the inquiry, the technical Panel suggested the following approach:

“The existing PI could be broken down and reporting could involve:

- The time taken from initial enquiry (telephone call etc) to provision of an OT assessment.
- The time taken to provide a housing solution as many enquiries for DFGs are resolved in different ways(re-housing, provision equipment and advice).
- The time taken to undertake an adaptation/DFG valued at under £1000, under £3000 over £10,000.”⁸⁶

Monitoring customer satisfaction

151. A number of witnesses felt there was too much focus on the performance indicator at the expense of the customer experience. However, Care and Repair emphasised that it had been developed to measure the process from the customer’s perspective – from their first contact with the local authority to the date the adaptation was completed.⁸⁷

152. The WLGA called for a more holistic approach to monitoring adaptations that is focused on outcomes. This point was echoed by the Older People’s Commissioner who suggested aligning monitoring of adaptations work with the National Outcomes Framework.⁸⁸

⁸⁴ Oral Evidence, 27 February 2013

⁸⁵ Oral Evidence, 27 February 2013

⁸⁶ Written Evidence, HA 14

⁸⁷ Oral Evidence, 7 March 2013

⁸⁸ Welsh Government, [Approach to the development of a national outcomes framework for social services in Wales](#), November 2012 [accessed 14 February 2013]

153. The Housing Technical Panel noted that some discussions are already taking place with a view to undertaking more sophisticated monitoring work, although this could require further resources:

“A colleague was talking about more in-depth questions: not just, ‘Are you satisfied with the service and the builder et cetera?’, but, ‘How has it affected you; are you able to stay in your own home; and how has it affected your health?’⁸⁹

154. The Technical Panel highlighted the potential pitfalls of a system that seeks more detail on outcomes, particularly where there were differences between what the client and medical professionals felt were appropriate adaptations. They noted that “satisfaction is a subjective thing, and it is difficult to measure.”⁹⁰

155. Care and Repair noted that they had already commenced more outcome focused monitoring for their clients:

“For the 22 Care and Repair agencies, we have introduced a single framework for asking older people questions about their experience of the service. That will also be needed, because if you introduce a quality-based performance indicator for adaptations for local authorities and housing associations, the same question needs to be asked in the same way.”⁹¹

Monitoring longer term outcomes

156. A number of witnesses suggested that longer term outcomes needed to be monitored. Disability Wales said:

“At the moment, success or failure is measured based on how long people wait for a certain grant, but there is no real assessment of how pleased the disabled client is with the adaptation in itself. Maybe you could go back in three or six months’ time to undertake a case study, which is not just a tick-box exercise, about how they feel or how much the adaptation has changed their life for the better, and, if it has

⁸⁹ Oral Evidence, 27 February 2013

⁹⁰ Oral Evidence, 27 February 2013

⁹¹ Oral Evidence, 7 March 2013

not gone quite so well, to consider how lessons can be learned for the future.”⁹²

157. In further written evidence to the Committee, the Technical Panel suggested the following as a possible approach to monitoring long term outcomes:

“A review of a percentage of adaptations delivered (10-20%) in a year to establish if they are being used, improved health and mobility, independence.”⁹³

Minister’s View

158. In oral evidence to this Committee, the Minister referred to the performance indicator and said:

“We measure the outcomes using performance indicators to see what they achieve. On whether we are measuring it for the right reason, I am not convinced. We need to look at what performance indicators are. It is all right to say that it is going to take 350 days to put in a DFG for someone, and you tick a box to say that you are within the statutory guidelines.”

159. He added that “I am not interested in measuring for the sake of measuring, which takes your eye off the delivery end of this. Let us get on with the delivery and make sure that we are doing it for the right reason.”

160. On the issue of monitoring customer satisfaction, the Minister said that “there are high levels of customer satisfaction, but it is not collected centrally.” He said that he had no objection to further work being undertaken in this area. He also agreed to give further consideration to follow-up monitoring.⁹⁴

Our view

161. It is clear from the evidence that there are a number of problems with the current performance indicator. Witnesses suggested that it was too narrow and that it was misleading. While a number of witnesses suggested that the introduction of the performance

⁹² Oral Evidence, 7 March 2013

⁹³ Written Evidence, HA 14

⁹⁴ Oral Evidence, 17 April 2013

indicator had a positive impact on service delivery, it is clear that it now needs reform.

162. We were pleased to hear that Local Authorities are monitoring customer satisfaction, but feel that this needs to be applied more consistently and meaningfully. Such monitoring should also take place during the process rather than after the adaptation has been delivered. In addition, we feel that there should be mechanisms in place to monitor the delivery and quality of the adaptation work itself. This was a key issue for the service users we spoke to. If necessary, arrangements should be put in place for the quality of work to be monitored independently.

163. In terms of the performance indicator itself, we have recommended that it should be reformed and have outlined a possible approach. The approach is based on proposals put forward by the Housing Technical Panel and we feel that it addresses the issues raised by witnesses.

164. We have, in addition, recommended that the Welsh Government should issue clear guidance on how a reformed performance indicator should be interpreted.

Recommendations

The Welsh Government should work with the WLGA and other stakeholders to introduce performance monitoring arrangements for all adaptation services across all tenures, including DFGs, and should ensure that they are accurate and transparent. Performance monitoring arrangements should include:

- The time taken from initial enquiry to provision of an OT assessment.**
- The time taken to provide an appropriate housing solution, including information on the mechanism under which that solution was delivered (for example, by DFG, Rapid Response or rehousing).**
- The time taken to undertake an adaptation/DFG over a range of costs.**

The Welsh Government should issue clear and detailed guidance on the new performance indicator so that it is interpreted and reported consistently.

The Welsh Government should ensure that, as a model of good practice, mechanisms are put in place in Local Authorities to monitor customer satisfaction and longer term outcomes, including the delivery and quality of work. We expect customer satisfaction to be monitored throughout the process. We expect mechanisms to be introduced so that quality of work can be independently monitored.

7. Funding and resourcing home adaptations

Introduction

165. The purpose of this chapter is to explore the funding mechanisms for adaptations, particularly through the Disabled Facilities Grant (DFG). The Chapter also explores other ways of maximising the resources available to the adaptations systems, for example, through recycling equipment and adapted housing registers.

Funding for DFGs

166. DFGs are funded by local authorities from their general capital resources. In 2010-11, expenditure on DFGs was almost £35 million. Authorities are not provided with any hypothecated (i.e. ring fenced) resources by the Welsh Government for DFGs. As noted in this Committee's scrutiny of the Welsh Government's budget allocations for 2013-14, there has been a substantial reduction in the notional allocation of general capital resources for housing.

167. The Housing Technical Panel noted that local authorities with the longest waiting times for DFGs are those with the least capital resources. They emphasised that budgets were under constant pressure:

“Regarding councils, obviously there are pressures on all budgets. In Merthyr Tydfil, our budget is allocated at around £650,000. It has not been sufficient for a number of years. At the year's end, when we spend just over £1 million, the councils have to find the funds. We are continually under that type of pressure, particularly in smaller authorities, to fund these works. It is a statutory service and we provide the adaptation come what may, but I do not know for how long that will continue, if we get into an overspend position and have to find the funding at the year's end.”⁹⁵

168. They added that demand was expected to increase due to an ageing population, which made up the majority of cases in the system.

169. However, they said that the fact that the DFG was a mandatory grant ensured that the service was protected, in terms of budgets:

⁹⁵ Oral Evidence, 27 February 2013

“One of the strengths of the current system is that it is mandatory and the council has to meet that need and that is its strength. It is not the same in the social sector because there is no requirement in relation to that. That is one of the biggest strengths. Those of us who are sitting here are in a lucky position—we are not facing the waiting-for-April scenario.”⁹⁶

170. Some witnesses suggested that, in practice, long waiting times were used as a way of managing budgets. The Wales Audit Office noted that current levels of funding are not always sufficient to deliver mandatory DFGs:

“...current investment is not always sufficient to deliver all the mandatory DFGs required and applicants often have to wait considerable time to secure a grant.”⁹⁷

171. Many other local authorities reflected on the reduced resources for funding adaptations. Caerphilly County Borough Council noted that some local authorities struggle to finance even the mandatory grant regime.⁹⁸ Conwy County Borough Council noted that although the available budget had fallen, the average cost of works had reduced through tighter specifications and effective procurement and looking at alternative products and materials.⁹⁹

Hypothecation

172. The issue of whether funding for DFGs should be hypothecated drew mixed reactions. Nigel Appleton told us that the effect of hypothecation is that:

“[...] effectively it puts a cap in place in the mind of the local authority. If that is how much they are given to spend and that is what it is identified for, there is a temptation to think that the funding is even more restricted than it is at present. I am much happier with the endorsement of the statutory responsibility to find the resources, and to give priority to that, than I would be with a specific budget.”¹⁰⁰

⁹⁶ Oral Evidence, 27 February 2013

⁹⁷ Oral Evidence, 13 March 2013

⁹⁸ Written Evidence, HA 07

⁹⁹ Written Evidence, HA 21

¹⁰⁰ Oral Evidence, 27 February 2013

173. While Care and Repair suggested hypothecation should be looked at,¹⁰¹ the WLGA felt that not hypothecating funding enables local authorities to allocate resources according to local priorities.¹⁰²

Funding from other budgets

174. The Committee heard some evidence that expenditure on adaptations could result in savings in health and social care expenditure. The Older People's Commissioner noted that timely adaptations can deliver cost savings across health and social care budgets and drew attention to research commissioned by the Welsh Government that evidences this. She noted that a £300-£1,000 stair lift could save £30,000 to the NHS if it prevents a hip fracture.¹⁰³

175. The Housing Technical Panel, along with many other consultees, emphasised the importance of adaptations to improving health outcomes:

“It is our view that there is a role for Welsh Government in exploring the value of adaptations services in Wales via some form of Health Impact Assessment. We are aware of the work being undertaken by Swansea University on the value of improvements to social housing. We are of the view that a similar study would support the view that more resources are required by adaptation services.”¹⁰⁴

176. In their written submission, Community Housing Cymru told us that:

“We need to see a combination of actions including the need for a better use of resources and the need to make the clear link between health, housing and social care and look at the integration, for example, of health and social care re adaptations budgets and oversee this. The key aim must be sustaining adequate resources in the light of increased demand.”¹⁰⁵

¹⁰¹ Oral Evidence, 7 March 2013

¹⁰² Oral Evidence, 21 March 2013

¹⁰³ Oral Evidence, 27 February 2013

¹⁰⁴ Oral Evidence, 27 February 2013

¹⁰⁵ Written Evidence, HA 23

Means Test

177. As indicated in Chapter 2, the use of the means test for the DFG has been an issue of ongoing discussion. The Welsh Government's review on the implementation of the Jones review (2010) highlighted that many local authorities believed that the means test was not a good use of resources.

178. During our inquiry, a number of witnesses raised this issue. While some stakeholders wanted to see the means test phased out, others saw a need to maintain it to prevent the "flood-gates" from opening. Others suggested that the means test should either be revised or abolished.

179. Nigel Appleton had fundamental concerns about the principle of using means testing. He said:

"[...] we seem to be lodged in what I have described as a welfarism approach, meaning that the process is designed to demonstrate ineligibility rather than eligibility. A great deal of time is spent on demonstrating that people should not have support through, for example, a DFG. If that effort was more directly focused on identifying need and responding to it, the process would be quicker."¹⁰⁶

180. Community Housing Cymru recognised that means testing is a contentious issue. They said that:

"In principle the need for adaptations shouldn't be means tested. Whether means testing was to be simplified or abolished for example, in terms of its use- fairness, bureaucracy and delays need to be looked at. Means testing can be complex and time consuming and potentially inequitable."¹⁰⁷

181. The Welsh Heads of Environmental Health Housing Technical Panel stated that while the means test was sometimes blamed for delays, they did not feel that this was the case and in most cases the process was quick and straight forward. They also noted that

¹⁰⁶ Oral Evidence, 27 February 2013

¹⁰⁷ Written Evidence, HA 23

removing the means test would put pressure on local authority capital resources and deflect from supporting the most vulnerable.¹⁰⁸

182. The College of Occupation Therapists felt that the means test should be removed and Care and Repair felt that the means test “needs to be either revised or abolished.” Nigel Appleton was of the view that the system should, at the very least, be less onerous. He also highlighted issues relating to the cost of administering the test:

“The test of resources, in my judgment, is almost as expensive to administer as any funds that it recovers, and, in some evidence I have seen, it costs more to administer than the funds it recovers. Now, it may be that that is because some people, knowing of the test of resources, do not enter the system in the first place. So, it is difficult to quantify, but I would like to see a pilot scheme at least that quantifies whether there is in fact a cost benefit to clawing that back.”¹⁰⁹

183. The Older People’s Commissioner echoed this view and called for a full cost-benefit analysis of the value of means testing to “answer that question once and for all.”¹¹⁰

Inconsistency in application of means test

184. In oral evidence, Shelter Cymru suggested that the means test was not being applied consistently.¹¹¹ However, the Minister confirmed to the Committee that he was unaware of this issue, and stated in a letter to the Chair dated 15 May 2013 that:

“My officials are not aware of any evidence that the means test is being applied inconsistently across Wales by local authorities and consider any evidence to date to be largely anecdotal. However, they will be raising the issue at the next meeting of the all-Wales Heads of Environmental Health Technical Panel to gauge local authority views on the matter.”

¹⁰⁸ Oral Evidence, 27 February 2013

¹⁰⁹ Oral Evidence, 27 February 2013

¹¹⁰ Oral Evidence, 27 February 2013

¹¹¹ Oral Evidence, 21 March 2013

Self funding

185. Though not a primary focus for this inquiry, some evidence referred to the self funding of adaptations. In written evidence, Powys Teaching Local Health Board noted that third sector organisations have become skilled at identifying sources of funding for people who need to self-fund but who do not have resources to pay for the full cost of necessary adaptations.¹¹²

186. In response to a question on the level of assistance given to self-funders, or those people not eligible for DFGs, Care and Repair told us:

“I suppose that the barriers to them are accessing the sort of professional services that would follow on if you are eligible for the DFG, such as local government surveys. I am not sure about OT assessment. I am sure that they would have a right to the OT assessment. However, the sort of professional services offered by local government and others, but not by Care and Repair, would not be available. Care and Repair, in terms of older people, actually helps self-funders. We will provide our services even though those people are not eligible for the grant. That is becoming an increasing theme of Care and Repair, particularly for disrepair, as opposed to adaptations, where there is hardly any funding available. So, self-funding is really important. We still have to take older people through that process and ask, ‘What works do you need? We need to specify them. Let’s get you a bona fide contractor and make sure that the quality of the works is right.’”¹¹³

Physical Adaptation Grants

187. The Housing Technical Panel also highlighted a potential inequity in the current system which sees proportionately more funding made available for some housing association tenants to receive home adaptations:

“In 2010/11 housing association tenants who make up less than 10% of households in Wales had access to £8.5m of funding for large scale adaptations via the Welsh Government Physical Adaptation grant (PAGs) scheme. In contrast owner

¹¹² Written Evidence, HA 03

¹¹³ Oral Evidence, 7 March 2013

occupiers and private tenants who make up 82% of households in Wales had access to just over £35m for Disabled Facilities Grants through Local Authorities.”¹¹⁴

188. Community Housing Cymru referred to PAGs and said:

“[...] we have mentioned PAGs, for example, the pot for which has increased from £3 million in 2006 to £8 million now. That is being top-sliced from the social housing grant, which is a decreasing pot in terms of delivering a further supply of housing.”

189. They went on:

“[...] it is £8.5 million out of a possible sum of £40 million or £50 million overall that is available to build houses [the Social Housing Grant programme]. We would not want to see that increased.”¹¹⁵

Stock Transfer organisations

190. LSVTs (housing associations established following a stock transfer) are expected to have made provision within their business plans for adaptations as they cannot access PAG funding. LSVTs’ business plans are submitted annually to Welsh Government. However, CHC note in their paper that this does not always happen:

“Certain LSVTs in Wales do not have funding built into their business plans and therefore the financial burden falls on the local authority which may not be the best option.”¹¹⁶

Accessible Housing Registers

191. One of the key issues to arise in previous reviews has been the use of accessible housing registers. This issue was also raised in this committee’s engagement event with users. The review on the implementation of the Jones review (2010) said that adapted housing registers were operating in many areas, and some local authorities were looking at expanding this to include private rented and owner occupied accommodation. Although the Welsh Government supports

¹¹⁴ Oral Evidence, 27 February 2013

¹¹⁵ Oral Evidence, 13 March 2013

¹¹⁶ Written Evidence, HA 23

their development, local authorities are not required to have such a register.

192. Disability Wales felt that, in relation to accessible housing registers, progress had ‘yet to materialise’. They referred to research they conducted in 2009:

“We have seen the benefits that local accessible housing registers have had on disabled people’s lives, and also on cost-efficiency. There are good examples, such as Cardiff Accessible Homes. Again, looking back at our research in 2009, 10 out of the 20 local authorities that responded to our survey said that they had an accessible housing register in place, but others did not.”¹¹⁷

193. Care and Repair felt that there were examples of good practice in some local authorities, but that was not consistent. They said:

“There are some good examples in Wales, such as the Cardiff accessible housing register and Swansea’s ADAPT project, where local authorities are working in partnership with housing associations. The project is about keeping good records of properties that have been adapted, keeping registers of people who need adapted housing and matching them when those properties become available to let. That is good practice, but it does not happen across Wales.”¹¹⁸

194. In written evidence, Diverse Cymru called for adapted housing registers to be made a legal requirement.¹¹⁹

195. While the principle of accessible housing registers was universally supported, some witnesses highlighted the practical difficulties of such an approach. Nigel Appleton told us that the registers needed to be sophisticated, if they were to be effective:

“As far as reusing adapted property is concerned, it is not always as straightforward as it seems, of course, in that a generic adaptation will not necessarily meet exactly the needs of the next occupant without further work and expenditure. I

¹¹⁷ Oral Evidence, 7 March 2013

¹¹⁸ Oral Evidence, 7 March 2013

¹¹⁹ Written Evidence, HA 10

am thinking of the example of some homes that I went to look at a number of years ago that were built for people in wheelchairs. The first occupant was someone who was born with a growth defect and was around four feet high, but the next occupant was someone who was 6 feet, 6 inches who had been in a car crash, so all of the heights and so on did not work for that individual and major change was needed.”¹²⁰

196. The College of Occupational Therapists suggested that it was difficult to ensure adapted housing was kept available for a disabled person when it became vacant:

“There is a lot of pressure put on the housing department not to hold a void property, and I think that that is partly the issue, because the pressure is there and you cannot have it empty for any length of time. There is not always sufficient time to find the appropriate person. You might need a couple of weeks to find someone if you do not have someone sitting there waiting. That is when the houses get used inappropriately, because of that pressure to avoid holding a void property.”¹²¹

197. The Welsh Government does not collate information on re-let times at a national level, but research for this Committee suggests it is often several weeks or months before social housing is re-let.

198. In their written evidence, Tai Pawb noted that changes to housing benefit for working age social housing tenants who under-occupy their homes could adversely affect the operation of accessible housing registers:

“Welsh Government continues to support the use and establishment of Accessible Housing Services in Wales (Framework for Action on Independent Living) however the unintended consequence of housing benefit reform and under occupation changes mean that the efficiency of such services is called into question. Previously Accessible Housing Services have operated on a best match or best fit approach which could result in under-occupancy. In effect the primary driver had

¹²⁰ Oral Evidence, 27 February 2013

¹²¹ Oral Evidence, 27 February 2013

been to provide the disabled person with a property which best matched their access needs in terms of adaptations.”¹²²

Recycling equipment

199. A number of witnesses raised the issue of recycling equipment. Conwy County Council told us that they saw recycling equipment as a way to be more efficient, including the recycling of stair lifts and hoists. The College of Occupational Therapists noted that it is not permissible to recycle old equipment such as stair-lifts where a DFG is provided. They said:

“The problem with the private sector and the disabled facilities grant is that you cannot recycle old stock under a DFG—the equipment has to be new. In our authority, we will use it in public sector stock. You cannot recycle some items; if it is a purpose-built stairlift, for example, you may not be able to recycle it.”¹²³

200. On the issue of recycling equipment, Community Housing Cymru told us:

“We do recycle stairlifts. This year, so far, we have fitted three that we have recycled, because they were taken out in very good condition. We store them and we get somebody to refurbish them to make sure that they are fit for use for the new resident. The accessible housing registers are a very good tool, if they are used right. Most local authorities are moving to common housing registers. We are working with them to try to ensure that adapted property information is captured on those.”

201. They went on:

“However, what tends to happen is that where you have a property that becomes vacant and has had an adaptation, sometimes it slips through the net. In addition, the people who are sent to us from common waiting lists might not need to have an adapted property. However, one of those people may be on the homeless register and they have to accept something

¹²² Written Evidence, HA 20

¹²³ Oral Evidence, 27 February 2013

quickly. So, they will accept it, but it may be a three-bedroomed house with a walk-in, level-access shower and they have four children. We then have to rip that out and put a bath in. You cannot reuse those showers. We have been looking at trying to reuse systems, but it is not always possible, unfortunately. It is not quite right, but it is getting better in some areas. There is still a lot of work to be done on that.”¹²⁴

Minister’s view

202. In terms of the adequacy of the funding provision for DFGs, the Minister told the Committee that he felt that it was appropriate. He added that how the funding was used was “down to the local authority”:

“If they choose to spend more on DFG and on a demand-led budget, that is entirely up to them. However, the consequence of that is that there is less money to spend on the other element. So, there is a block of money on which they make their choice. I do not think that that is a stop in terms of the headroom and making their priorities for DFG if they should so wish.”

203. On the use of accessible housing registers, the Minister told the Committee that there were some benefits to such an approach. However, on the issue of a national register, he said:

“From a data collection perspective, I do not quite know why we would collect data on a national basis. Currently, we operate, in terms of local authorities, on the basis of 22 local authorities, and their housing policies, et cetera, are all individual, so the use of a national database would be pretty insignificant. If it were to be based on housing allocation or on DFGs on a regional or national basis, there would be some advantage to that, but, generally, it is about local need and provision. I can understand, therefore, a local authority collecting and using those data, but I am not sure of the value of collecting data on a national basis—it would be collecting data for the sake of it.”

¹²⁴ Oral Evidence, 13 March 2013

204. The Minister went on to say that he felt that including the private sector in accessible housing registers would be useful, but that “the practicalities mean that is unrealistic.”¹²⁵

Our view

205. In terms of funding adaptations, it is clear that funding for adaptations services will come under increasing pressure in the coming years. Given the positive impact that an effective adaptations system can have on other services (e.g. health and social services), we feel that the Welsh Government should explore whether the contributions from those services’ budgets to adaptations services are appropriate.

206. In terms of maximising the resources that are available, we also feel that the Welsh Government should explore how Invest to Save funding can be used by Local Authorities and Local Health Boards for adaptations. We also feel that the Welsh Government should ensure that LSVTs have made adequate provision for housing adaptations in their business plans.

207. Given the success of the Independent Living Grant, we also think it should continue to be funded and the Welsh Government should explore how the programme could be extended.

208. In terms of accessible housing registers, we feel that these can have a positive impact and should be implemented as a model of good practice. We feel that the Welsh Government should explore how the proposed development of a landlord and agent licensing scheme in the forthcoming Housing Bill could be used to include the private rented sector on adapted housing registers. We also feel that the Welsh Government should ensure that as much as possible is done to recycle equipment.

209. Finally, in relation to the application of the means test for DFGs, we are persuaded that more work needs to be done to evaluate its value and have recommended that the Welsh Government should undertake a full cost benefit analysis of it.

¹²⁵ Oral Evidence, 17 April 2013

Recommendations

The Welsh Government should explore whether contributions from health and social care budgets to home adaptations are appropriate, so as to improve outcomes for patients.

The Welsh Government should conduct a cost-benefit analysis of the means test and report back to this committee on its conclusions.

The Welsh Government should continue to fund and explore the possibility of extending the Independent Living Grant programme.

The Welsh Government should ensure that all LSVTs have made adequate provision for housing adaptations in their business plans.

The Welsh Government should explore how Invest to Save funding can be used by Local Authorities and Local Health Boards for adaptations.

The Welsh Government should make accessible housing registers a statutory requirement. This should include all social housing. The Government should also explore how the forthcoming Housing Bill can be used to include private rented accommodation on such registers.

The Welsh Government should work with the various agencies involved in the adaptations process to ensure that opportunities to recycle equipment are maximised.

Witnesses

The following witnesses provided oral evidence to the Committee on the dates noted below. Transcripts of all oral evidence sessions can be viewed in full at:

<http://www.senedd.assemblywales.org/ielIssueDetails.aspx?IId=5136&Opt=3>

27 February 2013

Ruth Crowder, Policy Officer	College of Occupational Therapists
Helene Mars, Wales representative, COT SS Housing	College of Occupational Therapists
Neil Abraham, Chair of the All Wales Community OT Advisory Group (COTAG)	College of Occupational Therapists
Jonathan Willis, Housing Manager, Carmarthenshire County Council	The Welsh Heads of Environmental Health – Housing Technical Panel
Owain Roberts, Private Sector Housing Manager, Blaenau Gwent County Borough Council	The Welsh Heads of Environmental Health – Housing Technical Panel
Julian Pike, Housing Renewal Manager, Merthyr Tydfil County Borough Council	The Welsh Heads of Environmental Health – Housing Technical Panel
Sarah Rochira	Older People’s Commissioner for Wales
Nigel Appleton	Academic

7 March 2013

Rhyan Berrigan, Policy Officer	Disability Wales
Miranda French, Policy and Public Affairs Manager	Disability Wales
Chris Jones, Chief Executive	Care and Repair
Martyn Jones, Equalities Policy Advisor	Age Cymru
Wyn Jones, Information and Advice Manager	Age Cymru

13 March 2013

Sioned Hughes, Director of Policy and Regeneration	Community Housing Cymru
Nikki Cole, Head of development, Wales & West Housing	Community Housing Cymru
Shirley Davies, Homes and Neighbourhoods Director, RCT Homes	Community Housing Cymru
Steve Barry, Performance Audit Manager - Local Government Region	Wales Audit Office
Nick Selwyn, Performance Audit Lead - Local Government	Wales Audit Office
Emma Reeves-McAll, Equality and Diversity Officer	Tai Pawb

21 March 2013

Ivor Jones, Housing Improvements Manager	Conwy County Borough Council
Jim Stobbart, Customer Services Manager (Private Sector Housing)	Pembrokeshire County Council
Steve Kidwell, PO Housing Renewal, Housing Options & Community Care Support	Neath Port Talbot County Borough Council
Gill Pratlett, Joint Head of Service Integration and Improvement (Adults Services)	Torfaen County Borough Council
Naomi Alleyne, WLGA Director of Equalities and Social Justice	Welsh Local Government Association
Sue Finch, WLGA Housing Policy Officer	Welsh Local Government Association
Kenyon Williams, Caerphilly County Borough Council	Welsh Local Government Association
Jennie Bibbings, Policy Officer	Shelter Cymu

17 April 2013

Carl Sargeant AM	Minister for Housing and Regeneration
Alyn Williams	Welsh Government
Huw McLean	Welsh Government

List of written evidence

The following people and organisations provided written evidence to the Committee. All written evidence can be viewed in full at:

<http://www.senedd.assemblywales.org/mgIssueHistoryHome.aspx?Ild=5136>

Organisation	Reference
Evidence from a member of the public	HA 01
Merthyr Tydfil County Borough Council	HA 02
Powys Teaching Local Health Board	HA 03
Neath Port Talbot County Borough Council	HA 04
Cardiff Community Housing Association	HA 05
Disability Wales	HA 06
Caerphilly County Borough Council	HA 07
Care & Repair Cymru	HA 08
College of Occupational Therapists	HA 09
Diverse Cymru	HA 10
Wales Audit Office	HA 11
Coastal Housing Group	HA 12
Velindre NHS Trust	HA 13
Welsh Heads of Environmental Health, Housing Technical Panel	HA 14
Age Cymru	HA 15
Torfaen County Borough Council	HA 16
Pembrokeshire County Council	HA 17
The Royal British Legion	HA 18
Wales Heads of Environmental Health	HA 19
Tai Pawb	HA 20
Conwy County Borough Council	HA 21
Welsh Local Government Association	HA 22
Community Housing Cymru	HA 23
Older People's Commissioner for Wales	HA 24
Nigel Appleton	HA 25

Hywel Dda Health Board	HA 26
Shelter Cymru	HA 27
National Landlords Association	HA 28
Tony Roper	HA 29
Older People's Commissioner for Wales : additional written evidence 1	HA 30
Older People's Commissioner for Wales : additional written evidence 2	HA 31
Cardiff Community Housing Association	HA 32
Welsh Government	HA 33